

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Schultz Barrel and Drum  
Attn: Mr. Michael Schultz  
4800 South Morgan Street  
Chicago, Illinois 60609

Application No.: 05010061

I.D. No.: 031600GOQ

Applicant's Designation: DRUM RECOND

Date Received: January 26, 2005

Subject: Drum Reconditioning

Date Issued:

Expiration Date:

Location: 4800 South Morgan Street, Chicago, 60609

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of a paint spray booth, wastewater treatment system, 3 natural gas heaters and 1 drum wash dryer pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons/year for VOM and combined HAPs and 10 tons/year for single HAP). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
- 2a. Pursuant to 35 Ill. Adm. Code 218.204(j) (2) (A), except as provided in 35 Ill. Adm. Code 218.205 and 218.208, no owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the specified coating. The following emission limitations are expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator, except where noted. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition. The emission limitations are as follows:

kg/l  
0.42

lb/gal  
3.5

- b. No owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 is required to meet the limitations of 35 Ill. Adm. Code 218.301 or 218.302, Use of Organic Material, after the date by which the coating line is required to meet 35 Ill. Adm. Code 218.204, pursuant to 35 Ill. Adm. Code 218.209.

- 3a. Usage and emissions from the paint spray booth, including clean-up, shall not exceed the following limits:

<u>Equipment</u>	Single Hazardous		Combined Hazardous		Volatile Organic	
	Air Pollutant (HAP)		Air Pollutants		Material (VOM)	
	Usage and Emissions		Emissions		Usage and Emissions	
	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Paint Booth	0.5	5.0	1.25	12.5	1.25	12.5

These limits define the maximum emissions from the coating and solvents and drum reconditioning processes requested by the company and are based on only receiving open drums and all VOM in materials being emitted to atmosphere. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the previous month plus the preceding 11 months.

- b. This permit is issued based on negligible emissions of volatile organic material (VOM) from the wastewater treatment system. For this purpose, emissions shall not exceed nominal rates of 0.1 lb/hour and 044 tons/year.
4. This permit is issued based on negligible emissions of particulate matter (PM) from the paint spray booth. For this purpose, emissions shall not exceed nominal rates of 0.1 lb/hour and 0.44 tons/year.
- 5a. Emissions and operation of all natural gas combustion units, including 3 heaters and 1 drum wash dryer, shall not exceed the following limits:

i. Total maximum firing rate: 1.7 mmBtu/hr.

ii. Total Combined Emissions:

NO <sub>x</sub>		CO		PM		SO <sub>2</sub>		VOM	
<u>lb/hr</u>	<u>Ton/yr</u>	<u>lb/hr</u>	<u>Ton/yr</u>	<u>lb/hr</u>	<u>Ton/yr</u>	<u>lb/hr</u>	<u>Ton/yr</u>	<u>lb/hr</u>	<u>Ton/yr</u>
0.17	0.74	0.14	0.63	0.01	0.06	0.01	0.01	0.01	0.04

- b. These limits are based on the maximum firing rates, the maximum hours of operation (8,760 hours/year), and standard AP-42 emission factors. Compliance with annual limits shall be determined from a running total of 12 months of data.
6. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs,

or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.

7a. The Permittee shall maintain records of the following items:

i. Pursuant to 35 Ill. Adm. Code 218.211(c)(2), the Permittee shall collect and record all of the following information each day for the affected coating lines and maintain the information at the source for a period of three years:

A. The name and identification number of each coating as applied on each affected coating line, pursuant to 35 Ill. Adm. Code 218.211(c)(2)(A); and

B. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each affected coating line, pursuant to 35 Ill. Adm. Code 218.211(c)(2)(B).

ii. Monthly and annual usages of paints and solvents (gallons/month and gallons/year);

iii. VOM and HAP contents of each paint and solvent (lb/gallon or weight percent);

iv. Total natural gas usage of the source (Mft<sup>3</sup>/month and Mft<sup>3</sup>/year); and

v. VOM and HAP emissions, with supporting calculations for paint booth and the wastewater treatment system (tons/month and tons/year).

b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.

8a. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a

description of the exceedance or violation and efforts to reduce emissions and future occurrences.

- b. Pursuant to 35 Ill. Adm. Code 218.211(c)(3)(A), the Permittee shall notify the Illinois EPA of any record showing violation of Condition 2(a) (see also 35 Ill. Adm. Code 218.204) within 30 days following the occurrence of the violation.
  - c. Pursuant to 35 Ill. Adm. Code 218.211(c)(3)(B), at least 30 calendar days before changing the method of compliance with 35 Ill. Adm. Code 218 Subpart F from 35 Ill. Adm. Code 218.204 to 35 Ill. Adm. Code 218.205 or 218.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.211(d)(1) or (e)(1). Upon changing the method of compliance with 35 Ill. Adm. Code 218 Subpart F to 35 Ill. Adm. Code 218.205 or 218.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.211(d) or (e), respectively.
9. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
9511 West Harrison  
Des Plaines, Illinois 60016

It should be noted that the grinding machine and sodium hydroxide drum washer are exempt from state permit requirements, pursuant to 35 Ill. Adm. Code 201.146(aa) and (oo), respectively.

If you have any questions on this, please call Randy Solomon at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

DES:RBS:psj

cc: Illinois EPA, FOS Region 1  
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the drum reconditioning plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario that results in maximum emissions from such a plant. The resulting maximum emissions are below the levels, e.g., 25 tons/year for VOM and combined HAPs and 10 tons/year for single HAP at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, and control measures are more effective than required in this permit.

<u>Equipment</u>	Emissions (Tons/Year)						
	<u>VOM</u>	<u>Combined</u>	<u>Single</u>	<u>PM</u>	<u>NO<sub>x</sub></u>	<u>CO</u>	<u>SO<sub>2</sub></u>
Paint Booth	12.5	12.5	5.0	0.44			
Wastewater Treatment System	0.44						
Natural Gas Combustion	<u>0.04</u>			<u>0.06</u>	<u>0.74</u>	<u>0.63</u>	<u>0.01</u>
Totals	12.98	12.5	5.0	0.50	0.74	0.63	0.01

RBS:psj